

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION)
This document relates to:)
The County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al.)
Case No. 18-op-45090)
and)
The County of Cuyahoga v. Purdue Pharma L.P., et al.)
Case No. 1:18-op-45004)

**MDL No. 2804
Case No. 17-md-2804
Hon. Judge Dan A. Polster**

**MCKESSON CORPORATION'S
FINAL AFFIRMATIVE DEPOSITION DESIGNATIONS FOR DONALD WALKER**

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in In re National Prescription Opiate Litigation (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), Defendant McKesson Corporation hereby submits its final affirmative deposition testimony designations for Donald Walker together with Plaintiffs' objections and McKesson's responses to Plaintiffs' objections (see Exhibit A).

McKesson has not objected to Plaintiffs' affirmative designations for Donald Walker, which were previously served, because Plaintiffs withdrew Mr. Walker's deposition designations. However, if Plaintiffs were to attempt to play the deposition of Donald Walker at trial (to which McKesson would object), McKesson reserves the right to file objections and counter-designations to those affirmative designations.

McKesson further reserves all rights, including all rights to revise or withdraw its affirmative deposition testimony designations for Donald Walker and its responses to Plaintiffs' objections. McKesson further reserves the right to revise or withdraw its affirmative deposition testimony designations for Donald Walker and its responses to Plaintiffs' objections based on the Court's rulings, Plaintiffs' and other individual Defendants' designations of deposition testimony, and evidence introduced at trial.

By submitting these final affirmative deposition testimony designations for Donald Walker together with Plaintiffs' objections and McKesson's responses to Plaintiffs' objections, McKesson does not waive any objections to the use of testimony and/or exhibits or their subject matter. McKesson's inclusion of any testimony and/or exhibit within these final affirmative deposition testimony designations for Donald Walker together with Plaintiffs' objections and McKesson's responses to Plaintiffs' objections should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Plaintiffs or another Defendant. McKesson expressly reserves the right to object to Plaintiffs' attempts to introduce any testimony and/or exhibit included in these final affirmative deposition testimony designations for Donald Walker together with Plaintiffs' objections and McKesson's responses to Plaintiffs' objections.

Dated: October 10, 2019

Respectfully Submitted,

/s/ Geoffrey E. Hobart
Geoffrey E. Hobart
Mark H. Lynch
Christian J. Pistilli
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street NW
Washington, DC 20001
Tel: (202) 662-5281
ghobart@cov.com
mlynch@cov.com
swinner@cov.com

Counsel for McKesson Corporation

CERTIFICATE OF SERVICE

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Geoffrey E. Hobart
Geoffrey E. Hobart